IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

THOMAS E. SANTONI)	
Plaintiff,)	
v.)	Case No. 3:20-cv-00975
SARAH ELIZABETH MUELLER AND DOES #1-3, INCLUSIVE)	JURY TRIAL DEMANDED
Defendants.)	Judge Eli Richardson Magistrate Jeffery S. Frensley

DECLARATION OF SARAH MUELLER

Pursuant to 28 U.S.C.§ 1746, I, Sarah Mueller, hereby declare as follows:

- I lived in Tennessee from 2011 until early 2015. I then moved to Florida on or about February of 2015.
- 2. I returned to Tennessee in March 2017 and lived in Tennessee until March of 2018. I then moved to Arizona.
- I began corresponding with Plaintiff Thomas Santoni on or about December of 2017, as I was preparing to move to Arizona.
- 4. I have lived in Arizona ever since March 2018.
- 5. Mr. Santoni told me he started a new job as CEO in the fall of 2018. I later learned from a Google web search that this company was The State Group. There were press releases and other information to this effect publicly posted on the company's website.
- 6. On December 11, 2019, I contacted Adam Blumenthal and Bennet Grill of Blue Wolf Capital, an investor in The State Group, because I was concerned about the nature of



- posts that Mr. Santoni made publicly on the social media sites Twitter and Parler as well as privately in direct messages to me on Twitter.
- 7. I was particularly concerned about my safety and the safety of others because Mr. Santoni's posts were becoming increasingly hostile and violent, despite multiple suspensions of his accounts on Twitter. This escalated into posts and other concerning behavior toward me on Parler as well. I felt that others needed to assess Mr. Santoni's online behavior.
- The attached exhibit is a copy of the first email I sent to Blue Wolf Capital regarding Mr. Santoni.
- 9. I spoke with employees and representatives of Blue Wolf Capital during the course of their investigation into Mr. Santoni's social media posts. To my knowledge, Blue Wolf Capital and all the persons with whom I spoke are located in the state of New York. I communicated mainly with Mr. Jonathan Sulds, an attorney for Blue Wolf Capital. There was an associate on the phone with him at times, but I did not get this person's name. Mr. Sulds reached out to me and wanted to speak with me.
- 10. I did not hack into or attempt to hack into Mr. Santoni's internet network accounts or those of his family as he alleges in his Verified Complaint.
- 11. I did not steal or otherwise illegally obtain Mr. Santoni's confidential personal information as he alleges in his Verified Complaint.
- 12. I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 19th day of January, 2021.

Sarah Mueller
Sarah Mueller (Jan 19, 2021 17:25 MST)

Sarah Mueller